

UNITED STATES DISTRICT COURT
for the
Eastern District of Wisconsin

United States of America
v.

DANIEL ANDERSON
DOB: XX/XX/1969

Case No. 24 MJ 16

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of on or about 02/17/2023 through 05/17/2023 in the county of Milwaukee in the
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2252(a)(2)(A)

Production of Child Pornography

This criminal complaint is based on these facts:

Please see Affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Sarah Dettmering, Special Agent, FBI

Printed name and title

Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1

Date: 01/09/2024



Judge's signature

City and state: Milwaukee, Wisconsin

Honorable William E. Duffin, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Sarah Dettmering, being first duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since January 2018 and am currently assigned to the Milwaukee Division as a member of the Milwaukee Child Exploitation and Human Trafficking Task Force. My duties include investigating criminal violations relating to child sexual exploitation and child pornography. While employed by the FBI, I have investigated federal criminal violations related to child exploitation and child pornography. I have received training from the FBI specific to investigating child pornography and child exploitation crimes and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256) in various forms of media. As a result of my training, experience, and discussions with other law enforcement officers assigned to investigate child pornography and child exploitation, I am familiar with methods by which electronic devices are used as the means for receiving, transmitting, possessing, and distributing images and videos depicting minors engaged in sexually explicit conduct. I have also received training and gained experience in interview and interrogation techniques with enhanced training specific to cybercrimes, social media search warrants, residential search warrants, interviews and interrogations of subjects of criminal investigations, electronic device identification and forensic review.

2. The facts contained in this affidavit are known to me through my personal knowledge, training, and experience, and through information provided to me by other law enforcement officers, who have provided information to me during the course of their official duties and whom I consider truthful and reliable.

3. Based upon the information described below, I submit that probable cause exists to believe that Daniel ANDERSON, date of birth XX/XX/1969, has committed the crime of production of child pornography in violation of Title 18, United States Code, § 2252(a)(2)(A) while residing at 2424 W. Wells Street, Apt 114, Milwaukee Wisconsin 53233.

4. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

5. On or about September 6, 2023, FBI Memphis received information from the Lauderdale County Sheriff's Office (LCSO) regarding allegations that Child Sexual Abuse Material, also known as Child Pornography, hereinafter referred to as CSAM, of a twelve-year-old-girl, hereinafter Victim 1, was produced and distributed by Victim 1's mother, hereinafter C.E.

6. On or about July 14, 2023, a forensic interview was conducted of Victim 1 and notes were taken by the witnessing law enforcement officer from LCSO. Based upon the notes of the officer which I have reviewed, Victim 1 made several disclosures, which included:

a. When Victim 1 was 10 to 11 years old, Victim 1 lived with C.E. in Milwaukee, Wisconsin. During that time, Victim 1 was introduced to an adult male who was later identified by law enforcement to be Daniel ANDERSON¹.

¹ Victim 1 originally identified the male as "Dan Henderson," but through the investigation of law enforcement officers and further interviews of C.E. it was determined that the individual's name was actually "Daniel ANDERSON." "Dan Henderson's" driver's license image was shown to Victim 1, and Victim 1 said that was not the man that Victim 1 was referring to. After a review of C.E.'s cell phone, ANDERSON's CashApp was observed, as the account sent C.E. money. C.E. also used the name "Danny ANDERSON" during her interviews with law enforcement.

b. C.E. asked Victim 1 if C.E. could take pictures of Victim 1's body. Victim 1 saw messages on C.E.'s phone between C.E. and ANDERSON which showed that ANDERSON was asking C.E. to take the pictures of Victim 1. Victim 1 recalled one message stated, "if you get her to do it, I'll give you this amount of money."

c. The first time C.E. took pictures of Victim 1, they were in the apartment in Milwaukee, Wisconsin. C.E. told Victim 1 to pull down Victim 1's pants, lay down on the couch, and open Victim 1's legs. C.E. then took pictures of Victim 1's vagina, C.E. instructed Victim 1 to "open her vagina" for the picture. Victim 1 then observed C.E.'s phone, which showed that C.E. sent the pictures to ANDERSON.

d. Victim 1 took the pictures that C.E. requested because Victim 1 was afraid of C.E.'s threats to "whoop" Victim 1. Victim 1 explained that "whoop" meant getting punched.

e. Victim 1 saw on C.E.'s phone that ANDERSON sent C.E. \$600 on CashApp after C.E. sent ANDERSON the nude picture of Victim 1.

f. Victim 1 disclosed another time C.E. took pictures of Victim 1 while Victim 1 was in the shower, nude.

g. Victim 1 disclosed that on one occasion, C.E. took Victim 1 to ANDERSON's apartment in Milwaukee, Wisconsin. Victim 1 recalled that ANDERSON's apartment number was 114 and it was on "Wells"² Street. While at the apartment, Victim 1 was brought to a bedroom with a man named "Brian." C.E. told Victim 1 to pull down Victim 1's clothes, open Victim 1's legs, and lay down in bed. C.E. and Brian got into bed with Victim 1.

² The report written by the reviewing officer stated that Victim 1 said "Walls" Street, however after I listened to the recording of the interview Victim 1 appears to state "Wells" Street.

ANDERSON was there and “made it dark in the room.” C.E. covered the top of Victim 1’s body and Victim 1’s face with a white hospital blanket. Victim 1 then felt a rough finger, which Victim 1 believed to be Brian’s touching around her privates while C.E. and Brian “hunched³.” When C.E. told Victim 1 that they were done, ANDERSON took C.E. and Victim 1 out to eat and ANDERSON gave C.E. money.

h. Victim 1 recalled seeing pictures of other girls around Victim 1’s age on C.E.’s phone, which were sent to C.E. by ANDERSON.

7. On or about October 23, 2023, C.E. agreed to participate in an interview with an FBI Task Force Officer. I have reviewed the report from this interview, and C.E. made statements which included:

a. C.E. took nude images of Victim 1 and sent them to “Dan” in Milwaukee. C.E. identified “Dan” as Daniel ANDERSON. ANDERSON told C.E. to take the sexually explicit pictures of C.E.’s minor daughter and send them to ANDERSON in exchange for money.

b. C.E. described ANDERSON as in his 50’s, brown skin, tall and drives a new model white truck. C.E. had the phone number 757-334-0611 for ANDERSON.

c. C.E. showed the TFO C.E.’s CashApp account which showed a payment from ANDERSON to C.E. on or about June 24, 2023 for \$40. This payment was for a nude image of C.E.’s minor daughter, Victim 1. The account name that sent C.E. the money was “Danny

³ Victim 1 did not clarify or explain what she meant by “hunched,” but based on my contextual review, I believe this to mean that C.E. and “Brian” were also engaged in sexual activity while “Brian” was simultaneously touching around Victim 1’s private parts.

ANDERSON” and the image associated with the account bore a strong resemblance to the driver’s license image of ANDERSON.

d. ANDERSON would tell C.E. to take nude images of Victim 1, and would threaten C.E. if C.E. did not. C.E. did not explain the nature of the threats. ANDERSON sent C.E. images of other minor girls to show C.E. what he expected for pictures of Victim 1. C.E. then took the nude pictures of Victim 1 and sent them to ANDERSON. ANDERSON paid C.E. \$60-\$80 for the images. ANDERSON had naked images of other girls on ANDERSON’s phone.

e. ANDERSON brought girls Victim 1’s age, 11 to 12 years old, to the Potawatomi Casino in Milwaukee to have sex with men. C.E. witnessed ANDERSON bringing the girls to the casino and had conversations with ANDERSON about it.

8. On or about October 30, 2023, C.E. was again interviewed by the same FBI TFO. During this interview, C.E. identified ANDERSON from ANDERSON’s driver’s license picture as well as ANDERSON’s Wisconsin Sex Offender Registry picture as the individual who paid C.E. for naked pictures of Victim 1. C.E. was shown pictures of the apartment building in which 2424 W WELLS ST, MILWAUKEE is located and C.E. identified that as the building where ANDERSON lived. C.E. believed the apartment number was 113 or 114.

9. C.E. also placed a consensually recorded call to ANDERSON at phone number 757-334-0611, ANDERSON answered and stated that ANDERSON recently had a “hotel party.” After the call, C.E. told the TFO that a “hotel party” was where minor girls were present to have sex with adult men.

10. On or about November 3, 2023, C.E. was again interviewed by the same FBI TFO. I have reviewed the report written by the TFO, which stated that C.E. made statements including:

a. ANDERSON set up “dates” for C.E. on two occasions. C.E. went to ANDERSON’s apartment where C.E. had sex with a man for \$75. ANDERSON told C.E. to bring Victim 1 for the date. Victim 1 was in the bed during C.E.’s second date, while C.E. had sex with the man.

b. ANDERSON set up dates for older white men to have sex with underage black girls. C.E. witnessed ANDERSON let men into ANDERSON’s apartment, then shortly after, a young girl would show up. On one occasion C.E. traveled with ANDERSON to pick up a fourteen-year-old girl.

11. On or about November 10, 2023, C.E. was again interviewed by the same FBI TFO. I have reviewed the report written by the TFO, and listened to the interview recording, C.E. made statements including:

a. C.E. accompanied ANDERSON to rent rooms at the casino and watched young girls be brought inside. ANDERSON made C.E. sit by a slot machine so C.E. did not go with ANDERSON and the girls to the room. This happened approximately 15 times in or around January and February of 2023.

b. ANDERSON is at the casino every weekend. A casino worker helps ANDERSON. C.E. stated in the interview that the worker was “in on it” and was receiving money for helping ANDERSON. C.E. did not specify the nature of the help the casino worker provided.

c. C.E. went with ANDERSON in ANDERSON’s vehicle to pick up minor girls and watched ANDERSON bring the girls to his apartment. While in ANDERSON’s vehicle, C.E. saw older white men arrive and be admitted to the apartment by ANDERSON.

d. C.E. stated in the interview that on one occasion C.E. brought Victim 1 to ANDERSON's apartment, and ANDERSON "did touch my baby." C.E. disclosed that ANDERSON had Victim 1 get naked and asked C.E. to have sex with ANDERSON while Victim 1's clothes were off. ANDERSON touched Victim 1's breasts while C.E. and ANDERSON were having sex.

e. C.E. saw nude images of Victim 1 on ANDERSON's phone, which was an iPhone. C.E. sent nude images of Victim 1 to ANDERSON after ANDERSON asked for the nude images. C.E. saw images of other minor girls as well on the phone. C.E. did not specifically state that these images were sexually explicit, however, C.E. was asked about the pictures of other minor girls immediately following being asked about the explicit images of Victim 1 which made it seem as though these images were also sexually explicit.

f. ANDERSON drove a white Yukon style truck, which matches the description of the WHITE GMC YUKON.

g. Clients paid ANDERSON for sex with minors via the mobile application CashApp, ANDERSON told C.E. that the clients paid him via CashApp.

12. In the past C.E. has been on the phone with ANDERSON and ANDERSON would say he had to go because it had to set up a date. ANDERSON would say he had to go down to Potawatomi to get a room.

13. On or about November 9, 2023, an administrative subpoena was issued to Verizon Wireless for phone number 757-334-0611. The subscriber information listed the user as "Debbie Hughes" in Portsmouth Virginia and the device as an iPhone 13. C.E. described ANDERSON's phone as an iPhone. I know from my training and experience that subjects engaged in criminal

activity will sometimes use a false name in order to prevent records from identifying them. Therefore, “Debbie Hughes” is likely a false name as the number was known to be used by ANDERSON subsequent to the subpoena.

14. On or about July 5, 2023, ANDERSON was contacted by a Milwaukee County Sheriff’s Deputy during a traffic accident which ANDERSON was a part of and provided 757-334-0611 as his phone number. ANDERSON was driving the WHITE GMC YUKON, which was the style described by C.E. At that time ANDERSON gave the address of 956 N 27th Street, Milwaukee.

15. Employment records for ANDERSON showed that ANDERSON worked for Prolec-GE Waukesha (GE) and Western Building Products in Milwaukee (WBP). On or about January 2, 2024, ANDERSON was observed by FBI Agents at GE, and entered the WHITE GMC YUKON. ANDERSON then drove the WHITE GMC YUKON to WBP. Later that day ANDERSON was observed driving the WHITE GMC YUKON and entered the parking garage at 2424 W WELLS ST, MILWAUKEE.

16. ANDERSON’s profile on Wisconsin’s Sex Offender Registry listed 2424 W Wells Street, Apt 114, Milwaukee, Wisconsin as ANDERSON’s address but it was last verified in or about May 2023.

17. Based upon the interview with Victim 1 and C.E., ANDERSON resided in Milwaukee, Wisconsin when ANDERSON requested and received nude images of Victim 1.

18. On or about January 4, 2024, a Special Agent with the FBI made contact with the apartment manager, hereinafter N.M. for 2424 W WELLS ST, MILWAUKEE. N.M provided the lease agreement for ANDERSON which stated that ANDERSON rented apartment 114. The

“Parking Addendum” to the lease agreement stated that ANDERSON’s vehicle was the WHITE GMC YUKON. N.M. stated that ANDERSON was a current resident of 2424 W Wells St, Milwaukee.

19. During C.E.’s October 23, 2023 interview with the FBI TFO, C.E. provided the account name of ANDERSON’s Cash App account “\$Musba.” C.E. showed a transaction on C.E.’s Cash App from ANDERSON’s account which showed the name of the account, the name “Danny Anderson” and showed a picture of a male which bore a strong resemblance to known images of ANDERSON’s. This transaction was paid from ANDERSON to C.E. for \$40.00 on June 24, 2023, at 6:57 PM and was described as “For Ticket.”

20. Records for the “\$Musba” account were requested via subpoena and were received. The account identifiers for “\$Musba” showed the name “Danny Anderson,” date of birth XX/XX/1969, last four of social XX94 and the verification result as “verified.” These identifiers match with ANDERSON. The phone number for this account was 757-334-0611, which is the number known to be used by ANDERSON. The transaction described above from ANDERSON to C.E. was observed in the Cash App records, verifying that that account was the same account sending C.E. funds.

21. ANDERSON’s Cash App records showed approximately five transactions to C.E.’s Cash App account from May 2023 to June 2023, and approximately 10 transactions to Victim 1’s account from January 2023 to April 2023. These transactions ranged in value from \$12 to \$60.

22. On or about September 29, 2023, a search warrant issued in the Western District of Tennessee was executed on the Google Gmail account belonging to C.E. The account was active and stored backed up images from the phone which belonged to C.E. Some of the images found in

the Google Photos folder in the search warrant return appeared to be CSAM of Victim 1.

23. During the Child and Adolescent Forensic Interview conducted on or about October 3, 2023, Victim 1 was shown multiple images which appeared to be nude images of Victim 1. Victim 1 identified the image with the file name ending in 182432 which was found in the Google search warrant return. Victim 1 stated that this image was of Victim 1 and was taken by C.E. in Milwaukee, Wisconsin on C.E.'s TCL phone. The metadata from this image showed that it was taken on or about February 17, 2023 and the manufacturer of the camera used to take the image was TCL indicating that the image was taken on a TCL phone. The image is described as follows:

a. This file is a still image of black girl approximately 10 to 12 years old, showing the girl from above her navel to her knees. The girl is nude with her pants pulled down to around her knees. The girl's nude vagina is visible and centered in the image.

24. On February 17, 2023 ANDERSON was a resident of Milwaukee, Wisconsin. On February 17, 2023 C.E. and Victim 1 were residents of Milwaukee, Wisconsin. This image of Victim 1 was taken in Milwaukee, Wisconsin.

25. In the Google search warrant return there were approximately six sexually explicit images each appearing to be of Victim 1 taken on or about February 17, 2023.

26. On or about February 17, 2023, there was a Cash App transaction from ANDERSON to Victim 1 for \$10. The description for this transaction was "lil lady food."

27. On or about February 18, 2023, the following text exchange took place between C.E. and ANDERSON (DA) between around 9:54 PM (UTC-6)/CST and around 11:32 PM (UTC-6)/CST:

CE	Bae can you set me something up for tomorrow plz my baby don't have any pamper I really need to make something fast plz U here me
DA	???
CE	Wts up
DA	Call
CE	Hello
DA	Very good. The best ones. Now make sure you talk and see that y'all on the same page, because I'm going to test y'all to make sure
CE	Ok wen and she think she getting something for her pics ???
DA	Let me c what I can get for u. Now is she down or not ? I'll let you kno first thing tomorrow
CE	Yes and we talking bout it now

28. In this text exchange between ANDERSON and C.E., they are discussing Victim 1 and the images of Victim 1.

29. On or about May 11, 2023, the following text exchange took place between ANDERSON (DA) and C.E. between around 6:38 PM (UTC -5)/EST and around 8:26 PM (UTC -5)/EST:

DA	Are you trying to make that money today?
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CE	Doing wt cuz Ik for sure she not going to ft I can ft and send u pics
DA	Why did you ask me? What type of pics did I want her to take if y'all wasn't gonna do it?
CE	Im asking you can I do me or I want her
DA	Both Plus I paid you \$25 last time you only sent one PIC
CE	Ok
DA	Ok what?
CE	I know it was a catch when you asked if I needed something
DA	I'm glad you just said that no I'm not doing nothing because it wasn't OK I was getting the clothes on the low from her because she wanted some pills I was going to pay y'all for the pics I just said you sent one but since you want to be a smart ass, forget it
CE	Ok I was just saying and I never said that wasn't going to do anything u act like I can't say my feelings u always getting mad but ok thtz fine
DA	Because you always talking slick, saying that it was a kiss first of all, you never did anything for me, or gave me anything without me doing something in return so don't act like you've been doing goodbye me because you have it and you know it I'm just saying you asked me for to send the pics of what I want it as took the time to send the pics but you still haven't done nothing I was just seeing if you wanted to meet more money. All you had to do is have her FaceTime desk five dollars a

	minute that's \$25 for five minutes Which is more money so 10 minutes that's \$50 that's crazy I don't understand why you don't understand it
CE	I do understand but yup u rite u got it luv
DA	So are you and her gonna send something or do I need to look elsewhere?
CE	We abt to send Some pics
DA	Remember what you said they only look like the pics I sent
CE	Ima Help Her and she go do me so they can look right ima send them in a minute they eating right now bae Is that cool with you bae or u feel like I'm playing ???

30. The Google search warrant return photos showed that on May 11, 2023 between approximately 8:54 PM and 9:13 PM nine sexually explicit images were taken, all of which appear to be Victim 1.

31. One image, filename ending in 205405, was shown to Victim 1 during Victim 1's CAFI interview in October 2023. Victim 1 confirmed this image was of Victim 1 and was taken by C.E., C.E. posed Victim 1 for the image. This image was taken on May 11, 2023 at 8:54 PM, which was shortly following the conversation between ANDERSON and C.E. described above. The image is described as follows:

a. This image is of a black girl, approximately 10 to 12 years old. The girl is lying on her back nude from the waist down. The girl's legs are lifted in the air, exposing her nude buttocks and vagina to the camera. The girl is using her hands to spread her vagina, which is the center focus of the image.

32. The metadata from this image showed that the manufacturer of the camera used to take the image was TCL indicating that the image was taken on a TCL phone. C.E. was known to have a TCL phone as this was the phone turned over to law enforcement by C.E.

33. On or about May 17, 2023, at 22:04 UTC, around May 17, 2023 at 5:04 PM EST, ANDERSON paid C.E. \$60 via Cash App. There was no description in the transaction.

34. In the text exchange on May 11, 2023 between ANDERSON and C.E., ANDERSON was requesting images of C.E. and Victim 1. Shortly after this text exchange, C.E. took at least one image of Victim 1 which is consistent with the definition of child pornography. Victim 1 confirmed that this image was of her.

35. In the text exchange on May 11, 2023, ANDERSON is offering money to C.E. in exchange for the images of Victim 1.

36. In the text exchange on May 11, 2023, when ANDERSON stated “Remember what you said they only look like the pics I sent,” it showed that ANDERSON sent C.E. images of how ANDERSON wanted Victim 1 to look in the images. This was consistent with what C.E. and Victim 1 stated in their interviews.

37. Based upon the request of ANDERSON for images of Victim 1, ANDERSON offering money for the images, and ANDERSON directing C.E. how ANDERSON wanted Victim 1 to look in the images, then C.E. subsequently taking nude images of Victim 1, there is probable cause to say that ANDERSON directed the production of child pornography.

38. On May 11, 2023, ANDERSON was a resident of Milwaukee, Wisconsin. On May 11, 2023, C.E. and Victim 1 were residents of Tennessee. The images from May 11, 2023 were taken in Tennessee. C.E. and Victim 1 moved to Tennessee in or about March 2023.

CONCLUSION

39. Based on the information above, I submit that there is probable cause to believe that ANDERSON directed the production of child pornography depicting Victim 1, in violation of Title 18, United States Code, § 2252(a)(2)(A) while residing in Milwaukee, Wisconsin.